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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

SHANA GAVIOLA and  
JULIO SANDOVAL,  
  
Defendants.

CASE NO. 1:22-CR-0233-JLT-SKO

STIPULATION AND ORDER TO RESET  
PRETRIAL DEADLINES

**STIPULATION AND ORDER**

**IT IS HEREBY STIPULATED** by and between the parties hereto, and through their respective attorneys:

1. Defense counsel for defendant Gaviola has indicated that he intends to file a Motion to Dismiss or other related motions pursuant to Rule 12 of the Federal Rules of Criminal Procedure. The current pretrial order does not have deadlines or a hearing date for Rule 12 motions. The parties have agreed to the below briefing schedule and hearing date.
2. The parties all agree that a hearing on the many Motions in Limine and Rule 12 motions will be beneficial in streamlining the case and the parties are all available on September 15, 2025, for such a hearing. Defense counsel for Gaviola, who is out of the district, may request virtual appearance for the September 15 hearing date. Both the government and counsel for

defendant Sandoval do not object, but all parties understand that it is in the Court's discretion to allow such a virtual appearance.

3. The parties jointly request that the Court issue a revised pretrial order amending the existing order (ECF 128) with the following hearing dates and deadlines:
- a. Rule 12 Motions: motion due August 25, 2025; opposition due September 2, 2025; reply due September 8, 2025; hearing on **September 15, 2025, at 9:00 a.m.**;
  - b. Motions in Limine hearing on **September 15, 2025, at 9:00 a.m.**
  - c. All other deadlines issued in the Second Amended Pretrial Order (ECF 128) remain as scheduled.

Respectfully submitted,

KIMBERLY A. SANCHEZ  
Acting United States Attorney

DATED: July 25, 2025

By: /s/ Michael G. Tierney  
MICHAEL G. TIERNEY  
VERONICA M.A. ALEGRÍA  
Assistant United States Attorneys

DATED: July 25, 2025

By: /s/ George Pallas  
GEORGE PALLAS  
Attorney for Defendant SHANA GAVIOLA

DATED: July 25, 2025

By: /s/ Griffin Estes  
GRIFFIN ESTES  
REED GRANTHAM  
Assistant Federal Defenders  
Attorneys for Defendant JULIO SANDOVAL

**FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED:

1. Rule 12 Motions: due August 25, 2025; opposition due September 2, 2025; reply due September 8, 2025; hearing on September 15, 2025, at 9:00 a.m.;
2. Motions in Limine hearing on September 15, 2025, at 9:00 a.m.; and
3. All other deadlines issued in the Second Amended Pretrial Order (ECF 128) remain as scheduled.

IT IS SO ORDERED.

Dated: **July 25, 2025**

  
UNITED STATES DISTRICT JUDGE